

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re: Colleen Beth Higgins)	Case No.: 16-30731-KLP
)	
Debtor.)	Chapter 13
<hr/>		

RESPONSE TO OBJECTION BY LAURIE PEARCE

Comes now your Debtor, by counsel, who hereby denies all of the allegations contained in Laurie Pearce's objection to the Certification of Compliance pursuant to 11 USC Section 1328. Further, your Debtor asserts that said certification cannot be objected to by pleading and suggests that another procedural remedy exists. Your Debtor believes the purpose of this Objection, among others pleadings filed, is to harass and/or cause unnecessary delay in the conclusion of this case.

WHEREFORE, your Debtor prays that the Objection be OVERRULED and prays for an award of attorneys fees and/or sanctions pursuant to the Federal Rules of Bankruptcy Procedure 9011.

/s/ Brett Alexander Zwerdling
Counsel

Certificate of Service

I hereby certify that on March 4, 2021 a true copy of this Response was served by CM/ECF or mailed to the following parties:

Office of the U.S. Trustee
701 E. Broad St, Room 4304
Richmond, VA 23219

Laurie Pearce
2311 Thousand Oaks Drive
Henrico, VA 23294

Suzanne E. Wade, 13 Trustee
P.O. Box 1780
Richmond, VA 23218

And also by email to Laurie Pearce at
lp23294us@yahoo.com

/s/ Brett Alexander Zwerdling

Counsel for the Debtor
Brett Alexander Zwerdling, VBN 39569
Zwerdling, Oppleman, Adams & Gayle
5020 Monument Avenue
Richmond, VA 23230
Ph 804-355-5719 Fx 804-355-1597
bzwerdling@zandolaw.com